

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA¹

Case Number: 1:22-cv-22517-JLK

CAL CAMPOS,

Plaintiff,

vs.

CHANEL, INC., a Corporation,

Defendant.

CRYSTAL C. WILCOX,

Case Number: 1:22-CV-22519-KMM

Plaintiff,

vs.

CHANEL, INC., a Corporation,

Defendant.

COURTNEY E. MURRAY,

Case Number: 1:22-CV-22520-RNS

Plaintiff,

vs.

CHANEL, INC., a Corporation,

Defendant.

Plaintiffs' Unopposed Motion to Transfer and Consolidate Cases

¹This motion is being filed in each case to facilitate simultaneous notice to the parties and Court of the relief sought in the motion as to the three cases.



Plaintiffs, Courtney Murray, Crystal Wilcox, and Cal Campos, pursuant to Internal Operating Procedure 2.15.00 and Federal Rule of Civil Procedure 42, move, for entry of Order, *one*, transferring Case Number 1:22-CV-22520-RNS (the Murray case), and Case Number: 1:22-CV-22519-KMM (the Wilcox case), to Judge James Lawrence King (the judge assigned the lowest case number (the Campos case) by the Clerk of the Court), and, *two*, consolidating the three cases for the purposes of discovery after transfer, and as grounds state:

1. Nature of the actions. All three cases, brought under the Florida Civil Rights Act of 1992 (“FCRA”) by former employees of defendant, Chanel, Inc. (“Chanel”), were originally filed in Florida state court.² On August 8, 2022, pursuant to 28 U.S.C. § 1446(d), defendant removed the cases to the Southern District of Florida. After the Clerk assigned judges in the above referenced cases, defendant filed in each action notices of pending re-filed, related, or similar actions notifying the Court that *Murray v. Chanel, Inc.*, Case No., 1:22-CV-22520-RNS and *Wilcox v. Chanel, Inc.*, Case No. 1:22-CV-22519-KMM were similar to the lower numbered *Cal Campos v. Chanel, Inc.*, Case No. 1:22-CV-22517-JLK.

2. Nature of the relief sought in this motion. The plaintiffs, Courtney Murray, Crystal Wilcox, and Cal Campos, pursuant to Internal Operating Procedure 2.15.00 and Federal Rule of Civil Procedure 42, move, for entry of Order, *one*, transferring Case Number 1:22-CV-22520-RNS (the Murray case), and Case Number: 1:22-CV-22519-KMM (the Wilcox case), to Judge James Lawrence King (the judge assigned the lowest case number (the Campos case) by the Clerk of the Court), and, *two*, consolidating the three cases for the purposes of discovery after transfer.

²The plaintiffs in *Murray v. Chanel, Inc.* case no. 1:22-CV-22520-RNS, and *Campos v. Chanel, Inc.*, Case No. 1:22-cv-22517-JLK alleged retaliation claims against Chanel pursuant to the FCRA, and the plaintiff in *Wilcox v. Chanel, Inc.*, Case No. 1:22-CV-22519-KMM alleged age and race discrimination, as well as retaliation claims pursuant to the FCRA.

3. The standard for consolidating cases not only takes into account whether the cases share similar questions of fact or law, but also whether consolidation would promote judicial economy. See Burrow v. Forjas Taurus S.A., No. 16-Civ-21606-TORRES, at *16-17 (S.D. Fla. Feb. 9, 2018) (consolidating cases for the purposes of discovery and class certification because consolidation promoted judicial economies because the consolidated parties could “coordinate depositions, share documents, and determine the character of any proposed class that plaintiffs seek to certify.”).

4. As indicated by defendant’s notices of related cases, the three cases (which not identical) share common facts. The cases also share common questions of law, e.g., Chanel retaliated against its employees after complaining about discrimination. Furthermore, because the same attorneys are involved in the cases, the discovery is expected to seek information about similar witnesses and documents, which are factors favoring transfer and consolidation in the interest of streamlining the discovery process and reducing litigation costs. If the Court determines that the Murray and Wilcox cases should be transferred to the lower-numbered Campos case assigned to Judge King, consolidating all three cases after transfer also would promote judicial efficiency in addressing common discovery and pretrial issues.

5. Therefore, plaintiffs Murray, Wilcox, and Campos respectfully request that, ***One***, Case Nos. 1:22-CV-22520-RNS, and: 1:22-CV-22519-KMM, be transferred to Judge James Lawrence King (the judge presiding over the lower-numbered Campos case), and, ***Two***, after transfer, that the cases be consolidated for the purposes of discovery.

WHEREFORE, the plaintiffs move for entry of an order granting this motion, and granting them such other and further relief as the Court deems appropriate.

Certificate of Conferral

I hereby certify that counsel for the movants has conferred with defendant regarding the relief sought in the motion in a good faith effort to resolve the issues raised in the motion, including by providing a conferral draft of this motion, and that defendant has indicated that it does not oppose the motion to transfer and consolidate as long as the consolidation is limited to the purposes of discovery only.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by CM/ECF this 22nd day of August, 2022 to all counsel or parties of record on the Service List below.

/s/Rani Nair Bolen

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